

# Morgan Lewis

USDC SDNY  
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ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 4/28/2022

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April 27, 2022

**VIA ECF**

Hon. Analisa Torres  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 15D  
New York, NY 10007-1312

**Re: Paguada v. Rowan, Inc., Case No. 22-cv-1846-AT**  
**Joint Request to Extend Time to Submit Letter and Respond to the Complaint**

Dear Judge Torres:

We represent Defendant Rowan, Inc. in the above-referenced action. Pursuant to Your Honor's Individual Practices in Civil Cases, we write jointly with counsel for Plaintiff Dilenia Paguada respectfully to request that the Court (a) extend the parties' time to submit a joint letter and jointly proposed Case Management Plan and Scheduling Order be extended from May 3, 2022 to June 2, 2022, and (b) extend Defendant's time to respond to the Complaint from May 6, 2022 to June 6, 2022. In support of these requests, counsel for the parties states that the parties are engaged in discussions about a possible early resolution of this action. If granted, these extensions will permit the parties to focus on those efforts, rather than pleadings and litigation. This is the parties' first request to extend time to submit a joint letter and jointly proposed Case Management Plan and Scheduling Order. Defendant previously requested an extension of time to respond to the Complaint, which was on consent of Plaintiff's counsel, and which was granted by the Court. If granted the requested extensions will not affect any other dates scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

GRANTED. No further extension shall be granted absent good cause.

SO ORDERED.

Dated: April 28, 2022  
New York, New York




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ANALISA TORRES  
United States District Judge